

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
BROWNSVILLE DIVISION**

**UNITED STATES OF AMERICA**

**§**

**vs.**

**§**

**CRIMINAL NO. B-25-138**

**LEONARDO BAEZ-LARA  
NORA ALICIA AVILA-GUEL**

**§**

**GOVERNMENT'S NOTICE OF INTENT TO OFFER EXTRANEIOUS OFFENSES**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW the United States Attorney for the Southern District of Texas, by and through the undersigned Assistant United States Attorneys, and files this notice to defendants.

The Government may intend to use one or more of the following extraneous offenses in this trial to show motive, opportunity, intent, preparation, plan, knowledge, identity, or absence of mistake or accident, as provided by Rule 404(b) of the Rules of Evidence.

Defendants' knowledge of illegal status based on their failure to file Employment Eligibility Verification (USCIS Form I-9) employment record for employees unauthorized to work in the United States. Statement(s) made during interview of Defendants:

Offense:	Failure to fill out or file USCIS Form I-9 for employees unauthorized to work in the United States but employed under AB LLC
Date of Offense:	on or about February 2025
Date of Conviction:	None
Jurisdiction:	Cameron County, Texas
Offense:	Failure to participate in H-2B Program or any other non-immigrant visa program, or use E-Verify in hiring process
Date of Offense:	on or about February 2025
Date of Conviction:	None
Jurisdiction:	Cameron County, Texas

The Government respectfully gives notice of the possible use of any of the above-mentioned extraneous offenses. Additionally, the Government will approach the court before questioning any witness in regard to these offenses.

Respectfully submitted,

NICHOLAS J. GANJEI  
UNITED STATES ATTORNEY  
SOUTHERN DISTRICT OF TEXAS

**s/ Paul Marian**

PAUL MARIAN  
Assistant U.S. Attorney  
State Bar No. 24078919  
Federal Bar No. 3312749  
&

**s/ Baltazar Salazar**

BALTAZAR SALAZAR  
Assistant U.S. Attorney  
State Bar No. 24106385  
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600 E. Harrison, Ste. 201  
Brownsville, TX 78520

**CERTIFICATE OF SERVICE**

I, hereby certify that on **June 17, 2025**, a copy of Government's Notice of Intent to Offer Extraneous Offenses was sent to defense counsel, via Notification of Electronic Filing.

**s/ Paul Marian**

PAUL MARIAN  
Assistant U.S. Attorney